

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Joel Schneider,  
Magistrate Judge

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO  
DEFENDANT H.J. HARKINS COMPANY, INC. D/B/A PHARMA PAC**

**WHEREAS** the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs (“VCDs”);

**WHEREAS** Defendant H.J. Harkins Company, Inc. d/b/a Pharma Pac (“Pharma Pac”) having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

**IT IS HEREBY STIPULATED AND AGREED** between Plaintiffs Executive Committee and Pharma Pac that all current cases pending and all future cases to be filed in this MDL alleging claims against Pharma Pac in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/ Marlene J. Goldenberg

Marlene J. Goldenberg (MN Bar ID: 0394943)  
GOLDENBERGLAW, PLLC  
[mjgoldenberg@goldenberglaw.com](mailto:mjgoldenberg@goldenberglaw.com)  
800 LaSalle Avenue, Suite 2150  
Minneapolis, MN 55402  
Tel.: (612) 333-4662  
Fax: (612) 367-8107

On behalf of Plaintiffs' Executive  
Committee

Dated: August 5, 2020

/s/ Geoffrey M. Coan

Geoffrey M. Coan (MA Bar No. 641998)  
Hinshaw & Culbertson LLP  
53 State Street, 27<sup>th</sup> Floor  
Boston, MA 02109  
Tel: (617) 213-7000  
Fax: (617) 213-7001  
[gcoan@hinshawlaw.com](mailto:gcoan@hinshawlaw.com)

On behalf of Defendant  
H.J. Harkins Company, Inc. d/b/a  
Pharma Pac

Dated: August 5, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2020, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ Geoffrey M. Coan  
Geoffrey M. Coan